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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

VISHAL SHAH and JAYDEN KIM,
individually and on behalf of all others
similarly situated,

Plaintiff,

v.

FANDOM, INC.,

Defendant.

Case No: 3:24-cv-01062-RFL

**JOINT STIPULATION AND
~~PROPOSED~~ ORDER**

Pursuant to Civil Local Rule 7-12, Plaintiffs Vishal Shah and Jayden Kim (“Plaintiffs”) and Defendant Fandom, Inc. (“Fandom”) by and through their respective counsel hereby respectfully stipulate as follows:

WHEREAS, the Parties have agreed to the material terms of a proposed class settlement agreement and are currently working to finalize the full-form settlement agreement and associated documents;

WHEREAS, the Parties have also been working with potential claims administrators to ensure proposed Class Members receive the best practicable notice of the settlement;

WHEREAS, the Parties previously informed the Court that they believed they would be in a position for Plaintiffs to file a Motion for Preliminary Approval by September 16, 2025;

WHEREAS, the Parties have agreed they need some additional time to finalize the contours of the settlement and associated documents, as well as the selection of a claim administrator;

WHEREAS, the Parties anticipate being in a position for Plaintiffs to file the Motion for Preliminary Approval within 30 days of the deadline they previously anticipated;

WHEREAS, extending the timeframe for Plaintiffs to file a Motion for Preliminary Approval will not alter the date of any event or deadline already fixed by Court order;

WHEREAS, the parties have previously requested and obtained an extension for Defendant to respond to the Complaint (ECF No. 9), an extension for the Parties’ briefing schedule for Defendant’s Motion to Dismiss (ECF No. 14), and a stay of all deadlines in this matter until April 2, 2025 pending post-mediation negotiations (ECF No. 55);

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED that Plaintiffs shall file their Motion for Preliminary Approval on or before October 16, 2025.

Respectfully submitted,
TYZ LAW GROUP PC

Dated: September 12, 2025

/s/Stephanie Alvarez-Salgado
Stephanie Alvarez-Salgado

Attorneys for Defendant
FANDOM, INC.

Respectfully submitted,
BURSOR & FISHER, P.A.

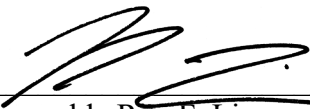
Dated: September 12, 2025

/s/Max S. Roberts
Max S. Roberts

Attorneys for Plaintiffs

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: **September 15, 2025**



Honorable Rita F. Lin
United States District Judge

SIGNATURE ATTESTATION

I, Stephanie Alvarez Salgado, attest that concurrence in the filing of this Joint Stipulation and [Proposed] Order has been obtained from the other signatory. I declare under penalty of perjury that the foregoing is true and correct. Executed on September 12, 2025.

/s/Stephanie Alvarez-Salgado
Stephanie Alvarez Salgado